

HMNB DEVONPORT AND DEVONPORT ROYAL DOCKYARD LIMITED DEFENCE NUCLEAR SAFETY REGULATOR'S SITE REPORT

1st August 2021 – 31st January 2022

1. FOREWORD

This report is issued as part of the Defence Nuclear Safety Regulator's (DNSR) commitment to make information about inspection and regulatory activities relating to the Defence Nuclear Programme¹ available to the Authorisee, the wider Defence stakeholder community, and members of the Local Liaison Committee where these are convened. The Secretary of State for Defence is answerable to Parliament for the safety of all defence activities; he has issued a Health, Safety and Environmental Protection Policy Statement requiring the Ministry of Defence (MoD) to comply with legislation, and where there are exemptions relating to defence activities, to make, so far as is reasonably practicable, arrangements at least as good as those required by legislation. DNSR is empowered to regulate nuclear and radiological safety in the Defence Nuclear Programme. This is achieved in a manner that complements and joins up with the work of statutory regulators².

Devonport Royal Dockyard Limited is both a Licensed Site and an Authorised site under MoD regulation. HMNB Devonport is an Authorised site under MoD regulation but it is not licensed. Authorisation is a process akin to licensing under the Nuclear Installations Act. DNSR Inspectors work closely with colleagues in ONR² (and other regulators); this report should be read in conjunction with theirs. This report is made available to members of the Local Liaison Committee where convened. Where possible, a DNSR Inspector will attend Local Liaison Committee meetings and will respond to any questions asked. Additionally, DNSR Inspectors are based at MoD offices in Bristol (although currently working remotely) and can be contacted via email at dsa-dnsr-enquiries@mod.gov.uk.

2. PERIOD OF THIS REPORT

This report covers the quarterly reporting period from 01st August to 31st January 2022.

3. DNSR ON SITE

DNSR staff were on site at DRDL and/or HMNB Devonport at the following times within this reporting period:

- 26 August
- 13-16 September
- 27-30 September
- 11-14 October
- 25-28 October
- 8-11 November
- 22-25 November
- 6-9 December

¹ Comprising the Naval Nuclear Propulsion Programme (NNPP) and the Nuclear Weapon Programme (NWP).

² The Office for Nuclear Regulation (ONR), the Environment agency (EA) and the Scottish Environment Protection Agency (SEPA).

- 10-13 January
- 24-27 January

4. DNSR – RESPONSE TO COVID-19

DNSR-IRM undertook a review of its plans in light of COVID-19 restrictions and have considered its preliminary impact on DNSR regulatory interventions. This resulted in a number of supporting regulatory interface meetings being conducted by remote IT (Skype/MS Teams) to establish actions, capacity and resilience of the HMNB(D) / DRDL Sites in managing this situation.

When remote engagement has limited full regulatory engagement through lack of on-site presence, we have continued to provide a high degree of oversight to site arrangements and safety case development to demonstrate that regulation remains an important focus to site arrangements through maximising the remote site engagements and use of internal regulatory oversight teams presence on site.

HMNB(D) / DRDL are reviewing their COVID 19 status continually to ensure they maintain safety. Both Sites Authorisation Groups are currently quorate and have full coverage and therefore safe to control work. Production and Commissioning are managing their resources to ensure safe to conduct work. As part of that, Devonport Accident Control Centre (DACC) has been stood up and are looking at the number of Duly Appointed Person (DAP) and Appointed Suitably Qualified and Experienced Person (ASQEP) on-site and reporting daily.

Focus remains;

1. Safe Site – Is the Site Safe with no / limited work on-going.
2. Safe to Control Work – Do we have the means safely to control work on site.
3. Safe to Conduct work – Do we have the teams able to conduct the work with the required levels of supervision.

5. INSPECTION OF THE SITE

Identified Inspections were undertaken with the sites:

- To gain evidence that the Authorisee's safety management arrangements remained adequate and assurance that their implementation meets the Authorisation Conditions.
- To drive improved safety performance and behaviours identified in the DNSR Intervention Strategy for the Devonport site.
- To monitor the Authorisee's actions in response to incidents, operations, maintenance, modifications, inspection findings, regulatory enforcement, safety case changes and other matters that might affect safety.
- Arrangements made and implemented were considered adequate in the areas inspected or appropriate recovery improvement programmes are in place where gaps in compliance were identified. DNSR have continually monitored progress against previously raised issues and sought to influence closure within a suitable timeframe.

- Specifically, site visits were made for:
- DNSR Compliance Inspection of DRDL arrangements for;
 - Authorised Condition 13 (Nuclear Safety Committees)
 - Authorisation Conditions 10 and 12 (Training and Duly Appointed Persons)
 - DRDL AC Compliance has been checked, and no significant concerns identified.
- DNSR themed Inspection of DRDL arrangements for;
 - A19 RAMP Work Package
 - ORI – Mobile Crane 5B (Joint with ONR/INO)
- DNSR Compliance Inspection of HMNB Devonport arrangements for;
 - Authorised Condition FAC1 Authorisee to Duty Holder Inspection was undertaken.
 - Authorised Condition AC28 (Examination, Inspection, Maintenance and Testing), Incidents on Site
- HMNB(D) AC Compliance has been checked and no significant concerns identified.
- DNSR themed Inspection of Naval Base arrangements for:
 - Fleet Non Operational Date (FNOD) inspection of arrangements for supporting A17 FNOD nuclear safety related activities.
 - Internal Challenge Function
- DNSR, in conjunction with ONR, witnessed an emergency exercise demonstration carried out by the site on 9th Dec. This exercise formed the second part of a two part exercise demonstration undertaken on 30th June 2021.

6. NON-ROUTINE MATTERS

Authorisees are required to have arrangements to respond to un-planned matters and events, including actions to implement necessary improvements. DNSR

reporting criteria and intervention thresholds are consistent with the ONR event reporting criteria and thresholds.

During this period, there was Nil HMNB(D) DINF1 reported and nil DRDL DINF1.

7. PERMISSIONING AND ENFORCEMENT ACTIVITY

- Emergency Exercise demonstration Part 2 of the modularised Emergency Arrangements at Devonport. Part 1 held 30/6/21. Assessed as adequate
- During this period, DNSR raised 01 Corrective Action Requirements (CARs) and 4 Recommendations with no Improvement Notices. DNSR will monitor progress against CARs and Recommendation closure through monthly engagement on Site.

Prepared by
DNSR-IRM
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Distribution:

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